

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re: )  
 ) Chapter 11  
W.R. Grace & Company )  
 ) Case No. 01-01139 JKF  
Debtors. ) (Jointly Administered)  
 )  
 ) **Hearing Date: December 5, 2006 at 8:30 a.m.**

**NOTICE OF JACOBS & CRUMLAR, P.A.'S RESPONSE TO THE DEBTORS'  
NOTICE OF FAILURE TO REACH AGREEMENT AND REQUEST FOR ENTRY OF  
DEBTORS' PROPOSED PROTOCOL CONCERNING PRODUCTION OF CHEST X-  
RAYS OF ASBESTOS PERSONAL INJURY, PRE-PETITION CLAIMANTS WITH  
NON-MESOTHELIOMA, MALIGNANT CLAIMS**

**TO:**

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The Office of the United States Trustee  
Attention: David Klauder  
844 N. King Street  
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*Trustee*

**PLEASE TAKE NOTICE** that Plaintiffs, represented by Jacobs & Crumplar, P.A.,  
object to the Debtor's Notice of Failure to Reach Agreement and Request for Entry of Debtors'  
Proposed Protocol Concerning Production of Chest X-Rays of Asbestos Personal Injury, Pre-  
Petition Claimants with Non-Mesothelioma, Malignant Claims.

**A HEARING ON THIS RESPONSE WILL BE HELD ON DECEMBER 5, 2006** at  
8:30 a.m. in Pittsburgh, Pennsylvania before Judge Judith K. Fitzgerald.

Respectfully submitted,  
**JACOBS & CRUMLAR, P.A.**

By: /s/ Robert Jacobs, Esquire  
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Date: December 1, 2006